

1 **JENNY L. FOLEY, Ph.D., ESQ.**

Nevada Bar No. 9017

2 **HKM EMPLOYMENT ATTORNEYS LLP**

3 1785 E. Sahara Ave, Suite 325

4 Las Vegas, NV 89104

5 Tel: (702) 625-3893

6 Fax: (702) 625-3893

7 E-mail: jfoley@hkm.com

*Attorney for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

8 JOSE BETANCOURT, An Individual ) CASE NO. **2:17-cv-02452-RFB-VCF**

9 )  
10 Plaintiff, )

11 vs. )

12 NEVADA PROPERTY 1 LLC, a Foreign )  
13 Limited Liability Company d/b/a The )  
14 Cosmopolitan of Las Vegas, DOES I-X; )  
15 ROE CORPORATIONS I-X. )

16 Defendants. )

**STIPULATION AND ORDER TO EXTEND DEADLINES FOR OPPOSITION TO  
AND REPLY IN SUPPORT OF DEFENDANT'S MOTION TO DISMISS  
(FIRST REQUEST)**

19 Plaintiff JOSE BETANCOURT ("Plaintiff"), by and through his attorney, JENNY L.  
20 FOLEY, Ph.D., ESQ., of the law firm HKM EMPLOYMENT ATTORNEYS LLP, and  
21 Defendant NEVADA PROPERTY 1 LLC ("Defendant"), by and through its attorney, SCOTT  
22 M. ABBOTT, ESQ., of KAMER ZUCKER ABBOTT, hereby stipulate and agree as follows:

23 1. That Plaintiff's Opposition to Defendant's Motion to Dismiss, filed on  
24 November 30, 2017, which Opposition is currently due by December 14, 2017, be extended  
25 until January 4, 2018.  
26  
27  
28

1           2.       That Defendant's Reply in support of its Motion to Dismiss be extended   until  
2 January 25, 2018.

3           3.       This extension of time request is made in good faith and not for purposes of  
4 delay. The parties have requested this extension of time due to the upcoming holidays and  
5 counsels' respective other pre-existing calendar commitments.  
6

7           4.       This is the first request for an extension of time in this matter.

8 Dated this 13th day of December, 2017.

Dated this 13<sup>th</sup> day of December, 2017.

9 **HKM Employment Attorneys LLP**

**Kamer Zucker Abbott**

10  
11 /s/ Jenny L. Foley  
12 Jenny L. Foley, Esq.  
13 Nevada Bar No. 9017  
14 1785 East Sahara Ave, Suite 325  
Las Vegas, Nevada 89104  
*Attorney for Plaintiff*

/s/ Scott M. Abbott  
Scott M. Abbott, Esq.  
Nevada Bar No. 4500  
3000 West Charleston Blvd., Suite 3  
Las Vegas, Nevada 89102  
*Attorney for Defendant*

15  
16 **IT IS SO ORDERED;**

17 

18 **UNITED STATES DISTRICT JUDGE**

19 DATED: December 15, 2017